

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

MRI Software, LLC,)	Case No. 1:12-cv-01082
)	
Plaintiff,)	Judge Christopher A. Boyko
)	
vs.)	
)	
Lynx Systems, Inc. et al.,)	
)	
Defendants.)	

**Motion to Extend Fact Discovery, Expert
Discovery and Dispositive Motion Deadlines**

Lynx Systems, Inc. hereby moves the Court under Federal Rule of Civil Procedure 16 for an order extending the fact discovery deadline until sixty (60) days after the Court has entered rulings on all of the following motions:

- Lynx's motion to compel MRI to produce the source code for the "Copyrighted Works" identified in its complaint (ECF # 96);
- Lynx's motion to partially dismiss MRI's amended complaint (ECF # 97);
- MRI's cross-motion for protective order (ECF # 102); and
- Don Robinson's motion to dismiss for lack of jurisdiction and for failure to state a claim (ECF # 106).

Lynx further moves that the expert discovery and dispositive motion deadlines be extended by similar amounts.

The fact and expert discovery deadlines and the dispositive motion deadline previously have been extended on several occasions to account for the evolving circumstances of the case. (*See, e.g.,* July 12, 2012 Minute Order; Sept. 19, 2012 Order, ECF # 32; Dec. 18, 2012 Journal Entry; Sept. 5, 2013 Journal Entry.) The

continued evolution of those circumstances, namely Lynx's and Don Robinson's co-pending motions to dismiss MRI's recently-amended complaint and Lynx's motion to compel, warrant the further requested extension. As such, this motion is not interposed for purposes of delay, but rather in the interest of judicial economy and the orderly prosecution of the parties' respective claims and defenses following resolution of the pending motions.

A memorandum in support of this motion is being filed herewith.

Respectfully submitted,

Dated: December 2, 2013

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Certificate of Service

I hereby certify that, on December 2, 2013, a copy of the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt, and parties may access this filing through the Court's system.

/s/ David T. Movius
Attorney for Lynx Systems, Inc.